

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

Case No. 21-MJ-845 (HB)

KI CHEUNG YAU

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to the Minneapolis Division where my investigative responsibilities include investigation of child exploitation crimes, cyberstalking, violent crime, and other offenses. I have gained knowledge and experience through training at the FBI Academy, in service training, and everyday work in conducting these types of investigations. I have received training in the area of Internet-based criminal investigations, including cyberstalking offenses, and have conducted numerous investigations involving crimes committed primarily on and through use of the Internet. I have also conducted searches pursuant to federal search warrants relating to many such investigations. I am a certified FBI Computer Analysis Response Team technician authorized to handle and search digital evidence such as computers, digital storage devices, and other digital media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by 18 U.S.C. §§ 3052 and 3107

to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

PURPOSE OF AFFIDAVIT

3. I make this affidavit in support of an application for a Criminal Complaint charging KI CHEUNG YAU (DOB XX/XX/1994¹) (hereinafter YAU) with Cyberstalking in violation of 18 U.S.C. § 2261A(2)(B).

4. Evidence obtained during this investigation shows that since at least on or about January 4, 2020, and continuing through the present, YAU created accounts on Internet services including Google, mail.com, pornhub.com, MeetMe, Tagged, Skout, Facebook, Instagram, Adult Friend Finder, and others detailed below using the name, date of birth, likeness, and in some cases contact information, of Victim 1. YAU then used these accounts to communicate with others on the Internet posing as Victim 1. In these communications, YAU portrayed Victim 1 as a woman interested in submissive sexual relationships with strangers and provided location information for Victim 1 to allow such strangers to follow through on YAU's invitations for sexual encounters in Victim 1's name. YAU created and used these accounts over time to stalk Victim 1, a resident of Minnesota, thereby causing Victim 1 substantial emotional distress. Specifically:

a. *Count 1.* Between on or about January 4, 2020 and continuing through the present, in the District of Minnesota and elsewhere, KI CHEUNG YAU did, with intent to injure, harass, intimidate, and place under surveillance with intent to injure, harass, and

¹ Per local rules, I have partially redacted personally identifying information, such as dates of birth, from this affidavit. Unless otherwise noted, this information is known to me and available to the Court.

intimidate another person, to wit, Victim 1, use one or more computer services or electronic communication services or electronic communication systems of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to Victim 1.

5. The facts set forth in this affidavit come from information obtained from other law enforcement officials, evidence gathered pursuant to subpoenas and federal search warrants, government records requests, public records, Department of Homeland Security records, information obtained from Victim 1, and my personal observations, training, and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause to support the contemporaneously filed application, it does not include each and every fact known to me or to other investigators. Because this investigation involves business records kept in various time zones, a subject and victims in different time zones, and persons travelling between time zones, all dates listed herein are approximate or “on or about” dates. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

PROBABLE CAUSE

6. The conduct described herein deals with images and personally identifying information of Victim 1 and other potential victims. To protect the privacy of victims and potential victims, I have removed or partially redacted their names and faces throughout this affidavit. Where victim and other parties’ names are used in online accounts and email

addresses, I have replaced the full name with initials. Some of the email accounts use the potential victims' first, middle, and last names out of order. I have placed initials in the order in which they appear in the account name.

7. Beginning in January 2021, Victim 1 made a series of reports to the Saint Paul, Minnesota Police and the Internet Crime Complaint Center regarding an unknown person(s) using her true name, likeness, and personal information to create online accounts on social media, dating, and sexually-focused websites. Victim 1 related that since approximately July 2020,² someone had been creating accounts, contacting her friends, and advertising a desire to engage in racially-oriented submissive sexual conduct. For example, Victim 1 reported an account on the dating and social media application "Tagged" advertising her Snapchat ID and Venmo³ account with the following text:

Red wine in a glass is aesthetically pleasing as being oreo sandwiched between two bbc⁴ life cannot be better 🍷

[Member Since July 20, 2020]

👋hi there my extroverts, my name is [Victim 1's name], i'm a 20yo snowbunny currently black owned and collared♠ i have a very submissive side to me & the only dominant part of me is actually my right hand lol i don't know if my parents are more disappointed in the fact that i voted for trump or that i first time losing my virginity was with a bbc. he became my dom by the time i was 17 but now he is busy pursuing his mission with his new bunnies, so i am completely unsupervised ans looking for a new dom/master to play with me. i really like the idea of being owned, every single part of me belonging to someone fully, not just my body but my mind,

² This information was known to Victim 1, but according to records received during the course of this investigation, the cyberstalking activity began well before this date.

³ Venmo is an online payments service.

⁴ An abbreviation for "big black cock."

my pleasure and my pain heheh can someone make me ur own little toy w a collar around my neck so that i don't forget and step out of line? i just want ur name on it jingling and reminding me of who owns me when i get thrown against a wall to be used for hours, reminding me that i have to beg for permission to cum, no matter how desperate i am because i always belong to u and it's because of u that i feel so good.



G [REDACTED] C

red wine in a glass is aesthetically pleasing as being once sandwiched between two
bbc life cannot be better!! 3 days ago

Last Active: 54 minutes ago

Profile Views: 5905 times

Profile Skills: Default

Member Since: July 20, 2020

Gender: Female

Location: [REDACTED] MN

Age: 20

Languages: English

Ethnicity: Caucasian/White

Religion: Christian

Orientation: Bi

ABOUT ME

About Me:

pnw so [REDACTED] venmo [REDACTED] 🍌 hi there my extroverts, my name is [REDACTED], i'm a 20yo snow bunny currently black owned and collared. i have a very submissive side to me & the only dominant part of me is actually my right hand lol i don't know if my parents are more disappointed in the fact that i voted for trump or that i first time losing my virginity was with a bbc. he became my dom by the time i was 17 but now he is busy pursuing his mission with his new bunnies, so i am completely unsupervised ans looking for a new dom/master to play with me. i really like the idea of being owned, every single part of me belonging to someone fully, not just my body but my mind, my pleasure and my pain heheh can someone make me ur own little toy w a collar around my neck so that i don't forget and step out of line? i just want ur name on it jingling and reminding me of who owns me when i get thrown against a wall to be used for hours, reminding me that i have to beg for permission to cum, no matter how desperate i am because i always belong to u and it's because of u that i feel so good

Pets



Value: \$176,229,073,107 Tv

Cash: \$80,104,194,850 Tv

Assets: \$80,104,194,850 Tv

Last purchase: Over 3 months ago

Pets: 0 | Wishers: 2

Buy now!

Owned by:



Mr.

Photos

[View all 19 photos](#)



Videos

No videos

The profile had 19 photos, including several photos of Victim 1, Victim 1's friends and family,⁵ and an advertisement for a sex toy. Victim 1 has and continues to receive online contacts from men she does not know.

8. In approximately August 2020, Victim 1 learned that an old friend of hers had been contacted by Instagram account [G].[V]. "G.V." is a male name. "G.V" wrote Victim 1's friend a direct message about the friend's purported dating profile. Publicly viewable information on the [G].[V] account profile showed the user purported to be a student at the same college Victim 1 attends in Minnesota.⁶ The user purported to be from Victim 1's home state and listed a website: blacklivesmatters.carrd.co.

9. Victim 1 learned from her roommates that sometime around 1:30 A.M. January 30, 2021, an unidentified male showed up at her residence, a location in Minnesota known to me but not included in this Affidavit. The man was unknown to Victim 1 or her roommates. He rang the doorbell and asked for Victim 1 by name. Victim 1 was not present, and her roommates told the man she was not home.

10. The following night, the man returned. He again rang the doorbell and asked for Victim 1 by name. Victim 1 was home and immediately called police, but the man left before officers arrived. Victim 1 saw the man stand outside on his phone for about five minutes before getting into his car and departing the area. Victim 1 did not see the man

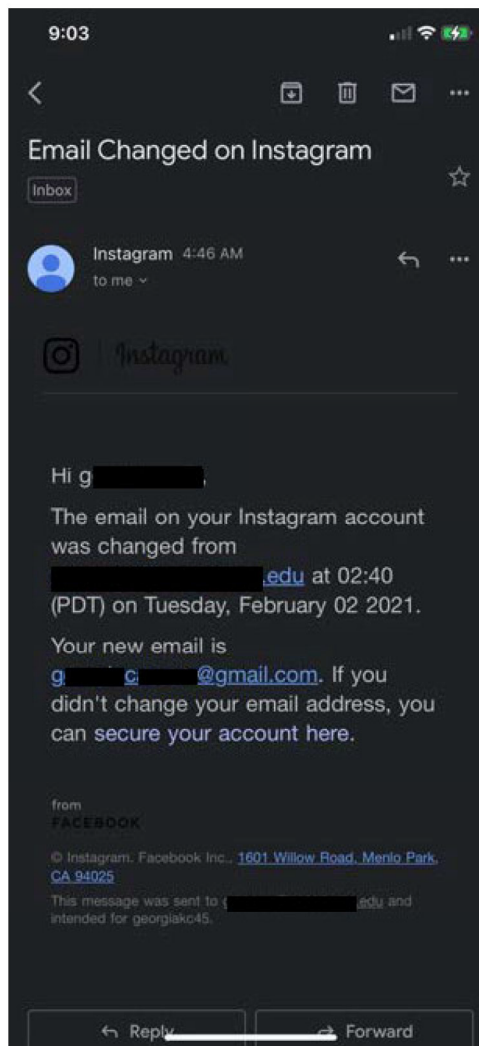
⁵ The photos appear to have been copied from Victim 1's real social media accounts.

⁶ According to the school's Office of Public Safety, there is no student enrolled with this name.

carrying any other items. Victim 1's friend observed that the man's car had no license plate, but had a sticker for a local college on the back window. Victim 1 observed the man looked older than college age.

11. Victim 1 believes that the man was given her name and address by the person who had created the online profiles and posts using her name and likeness. Based on my training and experience as well as the information provided by Victim 1, I believe it is likely the man was given Victim 1's name and address and was likely under the impression he was meeting Victim 1 for a sexual encounter. The fact he asked for her by name means he intended to meet with or speak directly to Victim 1. His arrival at 1:30 A.M. without any items in hand (other than the phone) makes other explanations (such as a delivery) much less likely.

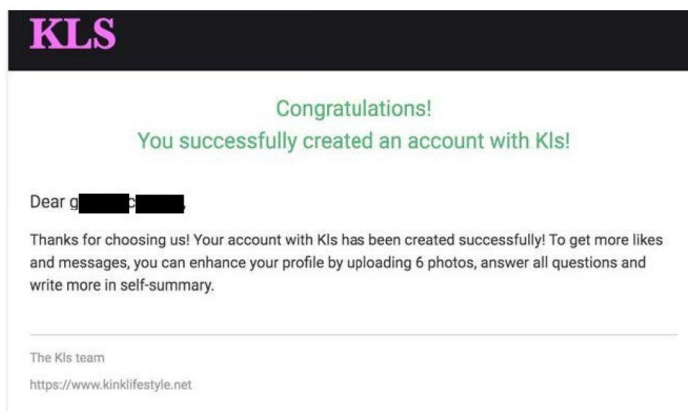
12. On February 2, 2021, Victim 1 received an email from Instagram. The email was an automated notification that her account's email address had been changed from Victim 1's true former email address to [GC]@gmail.com. Victim 1 did not create the Instagram account in question, did not access the account, and did not create [GC]@gmail.com. Based on these facts and my training and experience, I believe YAU created an Instagram account in Victim 1's name and registered the account with Victim 1's email address. He thereafter changed the registration email address to [GC]@gmail.com, an account YAU controlled.



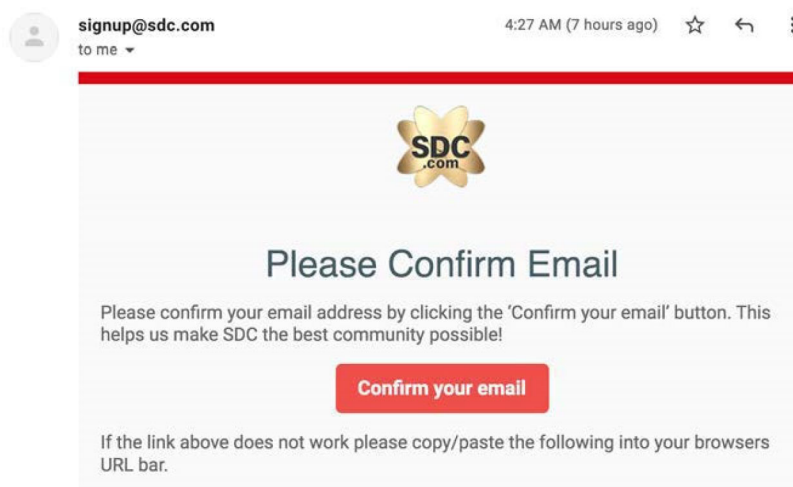
13. Victim 1 found an Instagram profile in her name and displaying her likeness. Like the [G].[V] account, this profile displayed Victim 1's school and the website blacklivesmatters.carrd.co. She also found two Facebook profiles in her name, one of which had a photograph of her.

14. In February 2021, Victim 1 received emails confirming registration of a profile on:

- a. "KLS" (kinklifestyle.net), advertised as "The Best Free Dating App to Meet BDSM, Fetish or Kinky Friends;"



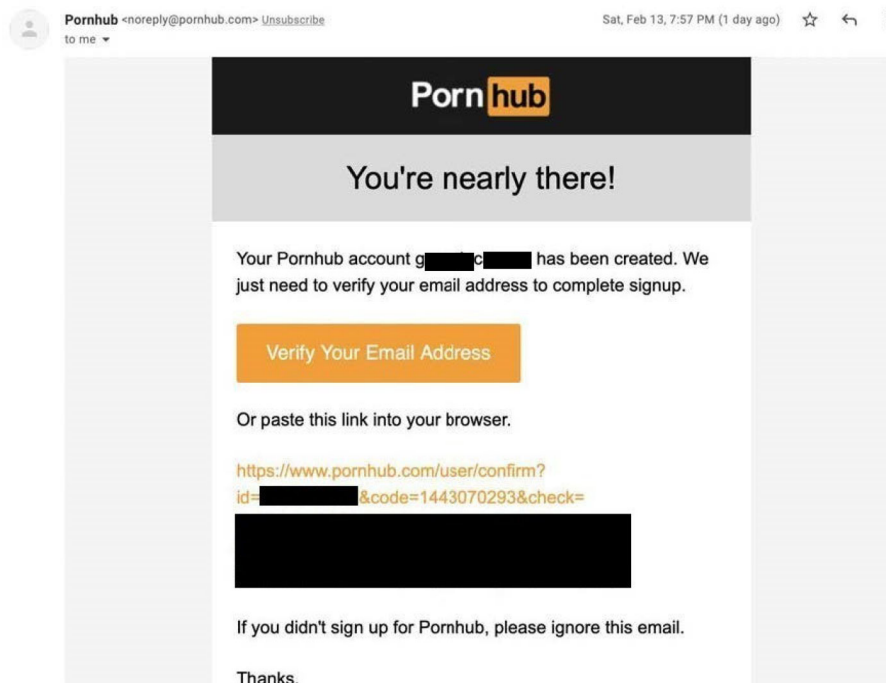
- b. sdc.com, a website for “the world’s largest lifestyle community to find hookups, threesomes, and moresomes with like-minded swingers and kinksters;”



- c. Easy3P, a “threesome dating app for couple & swingers;”
- d. Sexxters.com, the “uncensored social network;” and



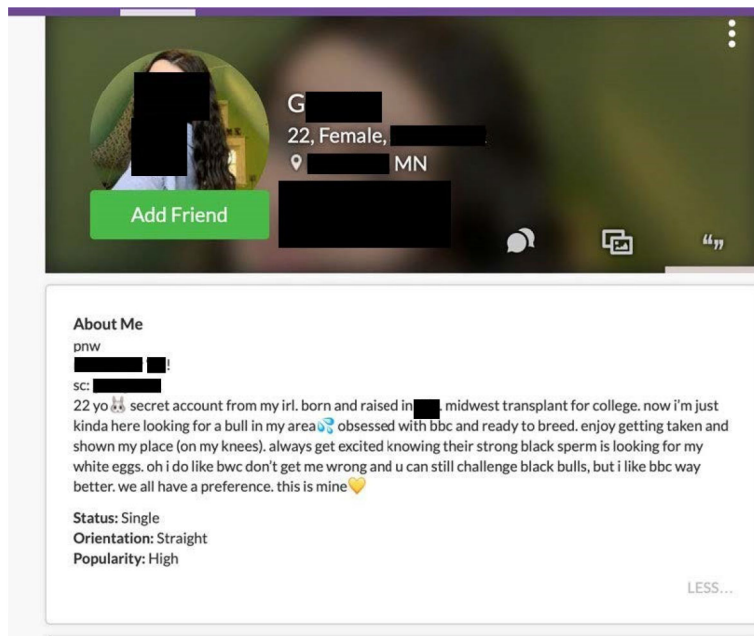
- e. Pornhub.com, a well-known pornography website. According to publicly available data, as of September 2021, pornhub.com ranked 13th in the world for highest website traffic and 3rd for adult sites.



Victim 1 reported she did not create any of these accounts. The profiles are not visible without registration on the sites.

15. On June 29, 2021, Victim 1 reported that a MeetMe⁷ account had been created in her name. This account also contained Victim 1's Snapchat ID, school information, and the region where she grew up. The profile stated:

22 yo 🐰 secret account from my irl.⁸ born and raised in [general location where Victim 1 grew up.] midwest transplant for college. now i'm just kinda here looking for a bull⁹ in my area 🍆¹⁰ obsessed with bbc and ready to breed. enjoy getting taken and shown my place (on my knees). always get excited knowing their strong black sperm is looking for my white eggs. oh i do like bwc¹¹ don't get me wrong and u can still challenge black bulls, but i like bbc way better. we all have a preference. this is mine ❤️.



⁷ MeetMe is a social media/dating application. Like the previously mentioned Tagged and Skout, MeetMe is owned by The Meet Group, Inc., a social media company headquartered in Pennsylvania.

⁸ An abbreviation of “in real life.”

⁹ A term referencing sexual dominance by a muscular, tall, or large man. The term is frequently used in the context of BDSM.

¹⁰ This emoji is often used as a reference to sexual fluids such as semen or vaginal excretions.

¹¹ An abbreviation for “big white cock.”

16. In response to this pattern of stalking and harassment, Victim 1 experienced substantial fear and emotional distress. She feels unsafe in her home and at school. She has been forced to change her email address, has recently moved, and frequently conducts Internet searches in an attempt to locate accounts purporting to be hers.

17. Victim 1 continues to receive contacts from men she does not know, primarily on Snapchat. She generally ignores the contacts, but on August 2, 2021, Victim 1 received and responded to a Snapchat message from one such individual. She asked him how he received her contact information. The person replied, “yes and you told me to snap you.” Victim 1 did not ask the person where he first communicated with the person posing as her.

18. On September 10, 2021, Victim 1’s close and long-time friend received a series of SMS text messages apparently intended for Victim 1. The messages came from a Canadian telephone number. The friend took a screenshot of the messages and provided them. They read:

11:03 PM—You there [Victim 1’s first name]?
11:06 PM—You drunk again?
11:08 PM—Can you come outside and meet me?
11:08 PM—Whenever you’re ready
11:09 PM—Come on out!
11:10 PM—Ok I hope you have a fantastic evening
11:10 PM—It’s been a pleasure. I hope you’ve had fun
11:10 PM—Take care



Victim 1 has changed her phone number and moved away from where she lived in January 2021 (when she was visited by the above-mentioned unknown male). Based on my training and experience as well as currently available facts, I believe YAU was likely communicating with the person who texted Victim 1's friend on a platform such as a dating website or social media site, or other messaging service posing as Victim 1. In furtherance of the pattern of stalking activity, I believe it is likely YAU erroneously gave this person the phone number of Victim 1's close friend instead of Victim 1's phone number. As mentioned above, the gerge.vrtis Instagram account contacted Victim 1's friend previously and therefore YAU likely has her contact information.

19. Facebook Inc. records obtained pursuant to a subpoena revealed email addresses [PJN]@gmail.com and [GC]@gmail.com were associated with at least five

Facebook or Instagram accounts. One was the george.vrtis account, two accounts were in the name of Victim 1, and two accounts in the names of other women. Of particular importance, Instagram ID 2312221882 was created in the name of an identified faculty member of Whatcom Community College in Bellingham, Washington. The account was created December 6, 2015, on an IP address¹² geolocated¹³ in the vicinity of Northern Washington state.

20. Between approximately October 27, 2017, and June 7, 2019, this Instagram account was accessed on a set of IP addresses assigned to Eastern Washington University. Between December 29, 2017, and January 5, 2018, the account was accessed on a set of IP addresses geolocated in the Hong Kong Special Administrative Region, People's Republic

¹² An Internet Protocol address, or "IP" address is a unique number or series of numbers and letters used by a computer to access the Internet. IP addresses can be dynamic, meaning that the ISP may assign a different unique number to a computer every time it accesses the Internet. IP addresses might also be static, if an ISP assigns a user's computer the same IP address each time the computer accesses the Internet. The most familiar version of an IP address is IP version 4, which is a series of four numbers separated by a period, e.g., 172.16.254.1. However, in recent years IP version 6 has come into use. IP version 6 addresses are eight groups of four hexadecimal digits with the groups separated by colons, e.g., 2001:0db8:0000:0042:0000:8a2e:0370:7334. Some domestic ISPs, such as Charter Communications, structure IPv6 addresses so the first four groups of four characters are the ones which identify the specific account at a given time. In other words, when examining two IPv6 addresses, if the first four groups match, the IP addresses belong to the same account, even if the last four groups are different. Charter Communications assigns dynamic IP addresses, but a given IP address may be assigned to a given customer for months or more depending on a variety of factors.

¹³ Internet service providers generally provision IP addresses within a geographic area. In my training and experience, I am aware some providers, such as Charter Communications, generally provide geolocation information for IP addresses in or near the city where the actual IP address is assigned. This information can be found in publicly available databases and does not display the exact location where an IP address is assigned at a given time.

of China. More recently, the account was accessed on a Charter Communications IP address geolocated in the vicinity of Burbank, California. The woman whose name and likeness appeared on the account was interviewed. She was not aware of any harassing or stalking messages directed at her. Despite this, the Instagram account is relevant to identifying the subject engaged in the stalking and harassment of Victim 1.

21. According to information provided by The Meet Group, Inc. pursuant to a subpoena and a search warrant issued in District of Minnesota case 21-MJ-697(DTS), the email addresses [PJN]@gmail.com and [GC]@gmail.com were used to register seven accounts as follows:

- a. Skout ID 162091737
 Email: [PJN]@gmail.com
 Name: [Victim 1's first name]
 Age: 22
 Birthdate: XX/XX/1998¹⁴
 Created: April 4, 2020
 Last Seen: June 14, 2020
 IP Logs: None provided
 Photos posted to the account depict Victim 1. Some of the photos depict Victim 1 with friends and one depicts her as a young child.

The account's "about me" section stated:

we all have one weakness that brings us to our knees. as a little girl, i wanted to be just like my daddy... now that i'm all grown, i'm still that little girl sittin' in his lap dreamin' as we face each other. his hands on my waist, our lips, interlocked in an intense kiss as i grind my kitty against his hardness. i just love doing life with him

¹⁴ The month and date for all of these accounts are the same and are the correct month and date for the victim's date of birth. The year is incorrect and would make the victim older than her true age.

- b. Skout ID 166752646
 Email: [GC]@gmail.com
 Name: [Victim 1's first name]
 Age: 22
 Birthdate: XX/XX/1998
 Created: July 20, 2020
 Last Seen: July 31, 2020

The account's "about me" section stated:

[Region where Victim 1 grew up]
 [Victim 1's school information including year of anticipated graduation]
 [Victim 1's Snapchat ID]
 a sub just giving daddy her an*¹⁵ vi*ignity and working out her kinks!
 love me or hate me, either way daddy's gonna collar me, put a leash
 on me, and abuse me. i'm his! he owns my body, my heart, and my
 soul. daddy's happiest is my greatest pleasure

- c. MeetMe ID 270335322
 Profile Name: [Victim 1's first name]
 DOB: XX/XX/1998
 Age: 22
 Zip: [Victim 1's prior location]
 City: [Victim 1's prior location]
 State: Oregon
 Email: [PJN]@gmail.com
 Date Joined meetme.com: May 4, 2020
 Registration IP: 104.48.241.153¹⁶
 Phone number used to verify account: N/A
 Recent Login: July 29, 2021 02:25:38 137.25.124.7017
 User Client: Android

¹⁵ In my training and experience, I am aware some social media and dating service providers employ automated content filters to detect and remove sexually explicit content. I believe YAU likely used the asterisk to circumvent such automated content filters. I therefore believe the words in this paragraph are "anal" and "virginity."

¹⁶ Assigned to AT&T U-Verse geolocated in the vicinity of Burbank, CA. This IP address was used to create and access other accounts in much of 2020.

¹⁷ Assigned to Charter Communications geolocated in the vicinity of Burbank, CA. This may be the IPv4 version of the IPv6 address mentioned elsewhere. Investigation into this IP address is ongoing.

Photos posted to the account include images of Victim 1, Victim 1's friends, and text images about social justice topics. One of the images appears to be a clip or screenshot of an image of Victim 1 (clothed) taken from a Pornhub page.

The account's "about me" section contained the text documented above in paragraph 15.

The account's content included several status updates posted by the user. Many of these portray Victim 1 as carrying on a sexual relationship with her father, being drunk, and being interested in group sex. For example:

July 25, 2021 – The account posted a photo with the caption, "had a kinky af 2-hour long threesome with this super hot couple that i met on a swinger website and i feel like anyone who even vaguely knows me is not suprised by that sentence at all."

June 12, 2021 – The user posted, "Feels so good moving into a new house knowing i get to spend my days with my bbc again and never have to live with my shit ass roommates ever again!! woohoo!!!"

June 16, 2020 – The user posted, "love wearing my mom's red lingerie in the house hoping my dad would come snatch my bu** up and remind me who this kitty belongs to"

June 14, 2020 – The user posted, "everytime daddy pops into my mind, i can't stop thinking about getting home 🍆."

June 3, 2020 – The user posted, "all i want is for someone to bend me over, rip my clothes off, grab my hips n breed me till i cry."

The account contained approximately 87 private messages. Many of the messages are from users apparently responding to posts about interest in sexual activity. Some of the men advise they have added the Snapchat account posted on the profile. In at least two instances, the user engaged other accounts in conversation about meeting up for sex. The user also provided Victim 1's parents' address in Oregon to these men and invited them to go to the address to have sex with Victim 1.

d. MeetMe ID 277096687

Profile Name: N/A [Previous name was listed as Victim 1's first and last names]

DOB: XX/XX/1998

Age: 23

Zip: N/A
City: N/A
State: N/A
Email: [GC]@gmail.com
Date Joined meetme.com: July 19, 2020
Registration IP: 104.48.241.153¹⁸ All IP addresses provided for this account are the same.
Phone number used to verify account: N/A
User Client: Android

- e. MeetMe ID 308573179
Profile Name: [Victim 1's first and last names]
DOB: XX/XX/2000¹⁹
Age: 20
Zip: [Victim 1's current city]
City: [Victim 1's current city]
State: Minnesota
Email: [GC]@icloud.com
Date Joined meetme.com: January 31, 2021
Registration IP: 137.25.124.70²⁰
Phone number used to verify account: N/A
Recent IP: 2021-01-31 16:43:43 137.25.124.70
User Agent: Android
A photo posted to the account depicts Victim 1.

The "about me" section contained the text detailed in paragraph 7, including Victim 1's former Snapchat ID and Venmo ID.

- f. Tagged ID 6122489180
Name: [Victim 1's first and last names]
Display Name: g
Birthdate: XX/XX/1998
Age: 22
Primary email: [GC]@gmail.com
Gender: F
Registration Date: July 27, 2020
City & State: [Victim 1's hometown]
Country: United States

¹⁸ See footnote 16.

¹⁹ This is Victim 1's correct birthdate and year of birth.

²⁰ See footnote 17.

Status: cancelled
Premium: No
Canceled: Other
Cancellation Date: July 29, 2021²¹
IPs: Most logged IPs were 104.48.241.153²²
Photos posted on the profile depict Victim 1.

- g. Tagged ID: 6122031260
Name: [Victim 1's first and last names]
Display Name: [Victim 1's first name and last initial]
Birthdate: XX/XX/2000
Age: 20
Primary Email: [GC]@gmail.com
Gender: F
Reg. Date: July 20, 2020
City & State: [Victim 1's current city], MN
Country: United States
Status: cancelled
Cancellation Date: July 29, 2021
IPs:
October 29, 2020 to August 17, 2021 - 137.25.124.70²³
September 29, 2020 to October 27, 2020 - 75.12.19.183²⁴
August 01, 2020 00:29 PDT to September 25, 2020 - 104.48.241.153²⁵

January 3, 2021 – The user posted, “some days there are no words, just feelings sad bc²⁶ my body isn't good enough to be used.. and i always fantasize about 5-6 men coming into my house uninvited and just giving me a nice gangbang. no talking or introduction, just straight into fucking me in my 3 holes at the same time, dominating

²¹ This is likely the date The Meet Group processed a preservation request for this account. In my training and experience, electronic service providers often review accounts upon receipt legal demands for any violations of terms of service and cancel accounts if they become aware of any such violations.

²² See footnote 16.

²³ See footnote 17.

²⁴ Assigned to AT&T U-Verse geolocated in the vicinity of Los Angeles, CA

²⁵ See footnote 16.

²⁶ An abbreviation for “because.”

me, and treating me like a ddlg²⁷ i am. anyone in St Paul, MN willing to make this happen?

December 26, 2020 – The user posted, “day dreaming of face fucked and treated like trash”

22. According to information provided by the owner of Adult Friend Finder pursuant to a subpoena, an adultfriendfinder.com account was created using [GC]@gmail.com in Victim 1’s name. The account was created from the Burbank, California IP address noted in paragraph 21(e). The profile viewable to Adult Friend Finder members stated:

hi there my extroverts, my name is [Victim 1’s first name], and i’m a snow bunny who wants to be owned and collared i have a very submissive side to me & the only dominant part of me is actually my right hand lol first time losing my virginity was with a bbc, he became my dom by the time i was 17. now he is busy pursuing his mission with his new bunnies, so me and my dog are completely unsupervised. looking for a new to play with, come join us! i really like the idea of being owned, every single part of me belonging to someone fully, not just my body but my mind, my pleasure and my pain heheh can someone make me ur own little toy w a collar around my neck so that i don’t forget and step out of line? i just want ur name on it jingling and reminding me of who owns me when i get thrown against a wall to be used for hours, reminding me that i have to beg for permission to come, no matter how desperate i am because i always belong to u and it’s because of u that i feel so good..

i’m looking for a new dom who will tie me to the bed and fill up all my holes til i forget my name. use me and abuse me, like yes choke me while u pound into my kitty. whatever gets us excited is all that matters ;) oh i do like bwc don’t get me wrong & u can still challenge black bulls but i like bbc way better & honestly it makes me a better woman. we all have a preference. this is mine :)

²⁷ An abbreviation for “daddy dom/little girl,” a type of BDSM relationship including “daddy” and “little girl” role play.

23. MG Freesites, LTD, owner of pornhub.com, provided records pursuant to a subpoena. According to MG Freesites records, two pornhub.com accounts were created using Victim 1's name. One account was registered on August 29, 2020, from the IP address used to create the account documented in paragraph 21(c), geolocated in Burbank, California. The registration email address was [GC]@gmail.com. The second account was registered on February 14, 2021, from a VPN IP address. The registration email address was Victim 1's true school-assigned email address.

24. Google LLC provided information responsive to subpoenas and District of Minnesota search warrant 21-MJ-641 (TNL) for the Gmail addresses used to create the accounts discussed above. Google LLC records reflect the following information:

- a. [GC]@gmail.com was created July 2, 2020, on an IP address geolocated in the vicinity of Burbank, California. The display name is Victim 1's name. The account was used to register a Samsung Galaxy Note 3 (SM-N900A) with International Mobile Equipment Identity (IMEI) number 358579051299361. The account contained hundreds of emails which appeared to be automated notifications for dating applications such as eHarmony, MeetMe, Tagged, and Adult Friend Finder. Other emails in the account documented registration of email addresses in the names of other women. Activity on the account included Google Maps searches for locations associated with Victim 1, including the GPS coordinates her parents' home address where MeetMe ID 270335322 invited the two men for sex, and the family cabin. The account was also active on several chat and dating sites, including MeetMe, Skout, and Tagged. The account used

“Mobizen Screen Recorder” and “instax-Download HD Instagram dp&stories.”

Google Play store records show the account downloaded applications such as Snapchat, Instagram, and one called, “Fake GPS location.” The account was accessed on a computer also used to access [PJN]@gmail.com. All IP logs provided by Google indicate that between December 20, 2020, and September 8, 2021, the account was accessed on the Charter Communications IP address²⁸ assigned to an identified apartment located in Burbank, California (the “YAU Residence”).

- b. [PJN]@gmail.com was created April 29, 2016, from an IP address geolocated in the vicinity of Northern Washington state.²⁹ The display name is NP’s first and last name. The recovery email address is [KJL]@gmail.com. The account contained thousands of apparently automated emails from online chat services, social media platforms, and dating sites, including emails from eHarmony addressed to Victim 1’s name. Several emails, especially early emails in the account, were apparently in Chinese. These included emails in 2017 from Snapchat to the user of a Snapchat ID containing the first initial and last name of the previously mentioned Whatcom Community College faculty member.

²⁸ As identified by the first four groups of characters.

²⁹ According to a search of publicly available Internet records conducted August 17, 2021. It is possible the IP address could have been assigned to a different location at the time it was used. Due to the date and ISP records retention policies, no subscriber information would be available.

Another email from 2019 with that woman's name from Instagram was sent in English regarding registration of an Instagram account in her name. The account contained an email dated November 20, 2019, from Microsoft regarding an attempt to initiate an account recovery for email address eu*****@outlook.com³⁰. The account contained an email dated January 4, 2020, addressed to Victim 1's name regarding registration of an email address with portions of Victim 1's name on the mail.com domain. More recently, on September 5, 2021, the account received an email from a service called "BlackWhite" to an account ID with Victim 1's first name and middle and last initial. Other emails of importance include registration of email addresses in the names of five other women, at least one of whom is a close friend of Victim 1. Searches conducted on the account included: a search for a phone number associated with Victim 1's parents on June 4, 2021; a search on "fastpeoplesearch.com" for residents of the Victim 1's parents' home address on May 26, 2021; a search for Victim 1's school on January 4, 2020; and a search for "ki yau tubmlr" on December 30, 2019. Activity on the account included data regarding social media profiles of at least a dozen women and girls, and data regarding use of Skout and MeetMe.

c. [KJL]@gmail.com was created February 14, 2016, from an IP address

³⁰ The email address was partially redacted by Microsoft. For reasons set forth below, I believe the complete email address was euginpan@outlook.com.

geolocated in the vicinity of Northern Washington State. The display name is JLK's full name. The recovery email address is [PJN]@gmail.com. Many of the early emails in the account were apparently in Chinese. Most of the emails appeared to be automated messages from Google and Facebook regarding accounts in the name of JLK.

25. According to AT&T records obtained pursuant to a subpoena, the Samsung Galaxy Note 3 with IMEI 358579051299361, the device associated with [GC]@gmail.com, was subscribed to by YAU at an address in Washington state from May 8, 2019, to August 18, 2019. Nearly all IP logs obtained from service providers during the course of this investigation show that in at least 2020 and 2021, the accounts were accessed almost exclusively from residential broadband connections, most recently at the YAU residence. This is consistent with the device no longer being assigned to an active AT&T Mobile account, but instead being used on a Wi-Fi connection at the YAU residence.

26. A Twitter account in the name of "[JK]" is followed by Twitter ID @euginpan. The @euginpan account has profile pictures depicting a partially identified Caucasian female. Investigation to confirm her identity is ongoing. Publicly available tweets are mostly sexual in nature. An Internet search for "Eugin Pan" yielded few results other than this Twitter account. Of particular importance, according to Facebook, Inc. records, the Instagram account in the name of the Whatcom College faculty member was previously associated with euginpan@outlook.com. A search of publicly available records revealed a Skype account associated with euginpan@gmail.com. That Skype account

shows username “kicheungyau” and shows a partial date of birth matching YAU’s true date of birth.

27. In response to a subpoena, Charter Communications provided subscriber information for one version of the IPv6 addresses used to access the Instagram and Facebook accounts and some of the other accounts listed above. The subscriber is a fictitious business the YAU residence. Based on publicly available information, I believe the apartment building is residential and the subscriber location would not likely be a business location receiving significant client traffic.

28. According to the United States Department of Homeland Security, Student Exchange and Visitor Information System (SEVIS), Ki Cheung YAU, date of birth XX/XX/1994, is present in the United States on a student (F-1) visa and currently resides at the YAU residence. SEVIS records show YAU began his studies in the United States in 2014 at Whatcom Community College in Bellingham, Washington. In 2016, YAU transferred to Eastern Washington University for a Bachelor’s degree. According to travel records, YAU traveled to Hong Kong on December 12, 2017, and returned to the United States on January 5, 2018. This travel coincides with the IP addresses geolocated in Hong Kong discussed in paragraph 20. After YAU completed a bachelor’s degree at Eastern Washington University, he began a master’s program at New York Film Academy—Los Angeles, a campus located in Burbank, California. All four main buildings of this campus are within approximately 4 miles of the YAU residence where the Charter Communications IP address was assigned.

29. According to information provided by the United States Postal Inspection Service, YAU received mail at the YAU residence as recently as the week ending September 18, 2021.

30. YAU holds a Washington driver license showing a Washington residence address. A search of public records databases did not associate YAU with the YAU residence, however, I believe it is likely YAU has simply neglected to obtain a California driver license or identification card. If, as with the Charter Internet account, a third-party primary lessee of the apartment holds all of the utility accounts, YAU's name would not necessarily appear in public records searches of the address.

31. I have searched publicly available records and found no information about any person with any of the names associated with any of the above-described email, social media, or dating site residing at the YAU residence. Therefore, I believe it is likely the person who created and uses all of these accounts did and does so in alias or false personae to pose as the women identified.

32. Based on information obtained from the subpoenas, search warrants, and other records discussed above, I believe YAU currently lives at the YAU residence and created and controls all of the accounts discussed above. I further believe he used and uses them in furtherance of a pattern of behavior intended to harass and intimidate Victim 1, and likely others known and unknown, which caused Victim 1 substantial emotional distress. Due to YAU's conduct, including the sexually- and racially-charged posts in her name, solicitations for sexual relationships, and two incidents where an unknown man went to Victim 1's residence, Victim 1 is in fear for her safety and reputation.

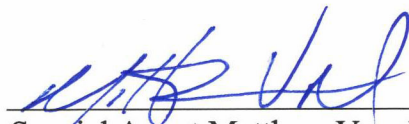
33. Based on the facts discussed above and my training and experience, I submit that since at least on January 4, 2020, YAU has stalked Victim 1 online and on at least two occasions, sent at least one person to make physical contact with Victim 1 using information he obtained online. Currently available information shows no known connections between YAU and Victim 1.

CONCLUSION

34. This investigation remains ongoing, as are victim identification efforts.

35. Based on the foregoing, I submit there is probable cause as charged in the proposed criminal complaint that KI CHEUNG YAU, in the District of Minnesota and elsewhere, has violated 18 U.S.C. §§ 2261A(2)(B).

36. Accordingly, I request that a warrant issue for the arrest of Ki Cheung YAU that he may be brought before this Court.



Special Agent Matthew Vogel
United States Department of Justice
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and
email) pursuant to Fed. R. Crim. P. 41(d)(3)
on November 12, 2021



THE HONORABLE HILDY BOWBEER
UNITED STATES MAGISTRATE JUDGE